



HARLEY PLANNING CONSULTANTS LTD.

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The Secretary

An Bord Pleanala

64 Marlborough Street

Dublin 1

DO1V902

18th February 2021

Our Ref : Graffy

Your Ref :ABP-309351-21

RE: Pre-application Consultation request under Section 37(b) of the Planning & Development Act 2000 (as amended)

Dear Sir/madam

I refer to our submission, ABP-309351-21 and wish to advise that An Bord Pleanala should be made aware of the total output of the project, details of which were not disclosed in the main submission. In this respect, the eight wind turbines, each with an output of 6.6 megawatts (MW), will result in an overall output capacity of 52.8MW.

Section 37A of the Planning & Development Act 2000-20 (the Act), outlines An Bord Pleanala's jurisdiction in respect of certain strategic infrastructural developments, the thresholds of which are set out in Schedule 7 of the Act. In addition, the strategic infrastructural developments must comply with certain conditions, which are set out in section 37A(2) in the Act.

Under Schedule 7, the threshold for wind energy infrastructure developments, is any installation with more than 25 turbines or having a total output greater than 50 megawatts (MW). The project before An Bord Pleanala, with an total output of 52.8MW, exceeds the defined threshold.

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The conditions to be complied with under section 37A(2) of the Act are

- (a) the development would be of strategic economic or social importance to the State or the region in which it would be situate,*
- (b) the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework, or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate, and*
- (c) the development would have a significant effect on the area of more than one planning authority.*

It is acknowledged that the proposed development would not comply with condition (c) in that it is located entirely within Donegal County Council and remote from any other planning authority, or national frontier boundary. As such it would not have a significant affect on the area of more than one planning authority.

However, it is considered that the proposed development complies with conditions 37A(2) (a) and (b) on the basis of the following:

- Central to the success of Project Ireland 2040 [a combination of the The National Development Plan (NDP) and the National Planning Framework (NPF)], is the national objective of *achieving a transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050*. The proposed development would be have strategic importance to the North West region generally and specifically to County Donegal, which is isolated within the region.
- The proposed development would help fulfil National Policy Objectives under the National Planning Framework (NPF). In particular, NPO 54 in the NPF seeks to

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'Reduce our carbon footprint by integrating climate change action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions'

In addition NPO 55 in the NPF, seeks to

'Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050'

- The Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region was adopted on 24th January 2020 and came into immediate effect. The RSES drills down from and supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of the Government. RSES identifies the importance of a reliable, high-quality, electricity supply, which is particularly important if the region is to attract high technology industries. To ensure the NW region has sufficient capacity and resilience in its electricity supply, RSES highlights, as an urgent priority for the region, the need for reinforcement of the electricity grid, which is predicated on the level of renewable generation in both Donegal and its hinterland in western Northern Ireland. The proposed development would support the robustness of the electricity to County Donegal and the NW region.
- The proposed development would make a significant contribution to meeting Ireland's renewable energy and greenhouse gas reduction targets, included in the Climate Action Plan 2019. It is anticipated that the development would be worth a significant amount to the regional and local rural economies.

It is respectfully considered that the proposed development would exceed the threshold set out in the Seventh Schedule of the Strategic Infrastructure Act, 2006, as amended by the

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Planning and Development (Amendment) Act, 2010 as the prospective development of 8 wind turbines, with a total power output of c.52.8MW, would exceed the 50MW threshold specified under the Schedule. It is also considered that the development falls within the conditions of sections 37A(2)(a) and (b) of the Planning and Development Act 2000 as amended by the Strategic Infrastructure Act, 2006.

I trust that this information clarifies the power output proposals associated with the development and assist the Board in its pre-consultation assessment.

Yours sincerely

Jim Harley

Harley Planning Consultants.

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